



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 8, 2022

VIA ECF

Hon. Jennifer L. Rochon
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Song v. Mayorkas, et al.*, 22 Civ. 5816 (JLR)

Dear Judge Rochon:

This Office represents the government in this action in which the plaintiff, proceeding *pro se*, seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate a Refugee/Asylee Relative Petition (Form I-730). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from November 14, 2022, to January 13, 2023). In addition, I respectfully request that the deadline for the joint letter updating the court on the status of this case, presently due on November 10, 2022, be extended to a date after the government’s response to the complaint is due.

I respectfully request the extension of time because USCIS issued a Notice of Intent to Deny relating to the Form I-730 and needs to allow additional time for the plaintiff to respond and then time to determine next steps and other adjudicative action that could render this action moot. In addition, the plaintiff has not responded to the government’s attempt to confer regarding the joint letter ordered by the Court. The process of attempting to confer with the *pro se* plaintiff is complicated by the fact that the only contact information for the plaintiff that the government possesses is a mailing address. This is the government’s second request for an extension of the deadline to respond to the complaint and to submit the joint letter. The Court granted the prior requests. *See* ECF Nos. 8, 11. Although the government attempted to seek the plaintiff’s consent regarding this extension request, the plaintiff has not responded. I apologize for filing this extension request the day before the deadline for the joint letter.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

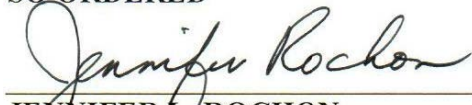
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cc: Plaintiff, *pro se* (via First Class Mail)

The request is GRANTED. Defendant shall respond to the Complaint by **January 13, 2023**. The parties shall file a joint status report by **January 24, 2023**.

Dated: November 10, 2022
New York, New York

SO ORDERED



JENNIFER L. ROCHON
United States District Judge